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FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

JUN 30 1997

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of )  
 )  
Administration of the North American Numbering Plan ) CC Docket No. 92-237  
Carrier Identification Codes (CICs) )

## REPLY COMMENTS

Sprint Communications Company, L.P. hereby respectfully submits its reply to comments filed on June 19, 1997, on the Petitions for Reconsideration of the Commission's *Second Report and Order* released April 11, 1997 (FCC 97-125) in the above-captioned proceeding. These petitions for reconsideration, filed by Comptel, Telco Communications Group, Inc. ("Telco") and Vartec Telecom, Inc, sought additional time to transition from 3 to 4-digit Carrier Identification Codes ("CICs") and from 5 to 7 digit Carrier Access Codes ("CACs"). In addition, Vartec proposed that the Commission permanently grandfather 3-digit CICs and their associated 5-digit CACs. As discussed briefly below, the comments filed demonstrate that a brief extension of the permissive dialing period is warranted, but that the grandfathering of 5-digit CACs is not warranted.

Except for US West, commenting parties all support Petitioners' request to extend the transition period.<sup>1</sup> As various parties point out, a longer permissive dialing period is

<sup>1</sup> See, e.g., Sprint, p. 2 (supporting an additional 6 months); Cable & Wireless, p. 1 (additional 2 years); MCI, p. 5 (until "the date upon which, according to the Bellcore data, ...end [of the permissive dialing period] is required in order to accomplish the Commission's stated goal of accommodating the industry's growing demand for CICs," or until such time as "the RBOCs must provide intraLATA toll dialing parity" (p. 7));

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warranted because a substantial amount of work remains to be done to upgrade and reprogram equipment (both LEC switches and customer CPE) to accommodate the longer dialing sequence and to educate end users on the new dialing requirements. Until LEC switches are equipped to handle 7-digit CACs, it would be confusing and counter-productive to reprogram end users' equipment to dial 7-digit CACs or to instruct callers to dial 7-digit CACs.

Based on anecdotal information included in the petitions and comments, it appears that some LECs have not yet upgraded their switches to accommodate 7-digit CACs.<sup>2</sup> US West, which asserts that all of its switches currently accommodate all 522 4-digit CICs, states (p. 5) that rather than extending the transition period for all carriers, "a waiver of the Commission's conversion requirements, based on an underlying LEC's inability to complete the conversion in a specific central office within the required time-frame..." is the more appropriate course of action. However, in order for this approach to be workable, the affected LECs must request the waiver immediately so that IXC's and vendors can plan their equipment modification and consumer education programs accordingly. Insofar as Sprint is aware, no such waiver has yet been filed.

Moreover, US West's recommendation does not address the problem of LECs whose switches will not be upgraded until January 1, 1998. IXCs will not have sufficient

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TRA, p. 8 (additional 3 years); Worldcom, p. 8 (additional 2 years); AT&T, p. 4 ("AT&T has no objection to a longer transition.").

<sup>2</sup> See, e.g., Comptel petition, p. 6; Worldcom comments, pp. 5-6. Sprint has been working with LEC industry trade associations and through the NOF to obtain information as to which LEC switches have been upgraded to handle 7-digit CACs, but has been unable to get information from many smaller LECs.

time to perform field tests with LECs who convert their switches at the very last minute, much less help end users to modify their CPE. As Worldcom correctly states (p. 3), if LECs wait until January 1, 1998 to modify their switches to accommodate 7-digit CACs, there will be no transition; “[i]nstead, it will be a flash cut from five digit to seven digit CACs,” with IXC and vendors facing “numerous requests for simultaneous reprogramming” of PBXs and other CPE. To avoid this situation, all LECs should be required to implement 7-digit CACs by a date certain, with permissive dialing allowed for several months thereafter.<sup>3</sup>

Only one commentor, CGI/Communigroup (which filed jointly), supports Vartec’s proposal that the Commission permanently grandfather most 5-digit CACs. However, these comments are for the most part a verbatim repetition of Vartec’s petition, and CGI/Communigroup’s arguments suffer from the same deficiencies as Vartec’s, which were noted by Sprint in its comments. For example, CGI/Communigroup argues that the “minimal difference between dialing 5 digit CACs and 7 digit CACs would not pose a hindrance to competition, and is reasonable under the Act” (p. 4). Yet, only a few sentences later, it asserts that “the increased time and effort in dialing a longer CAC will impair dial-around carriers’ ability to attract customers. Customers used to using five-digit CACs will perceive seven-digit CACs as too cumbersome...” (*id.*, pp. 4-5).

Established dial-around providers such as Vartec, CGI, and Communigroup cannot have

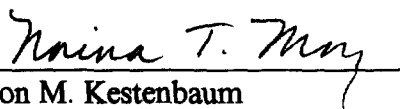
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<sup>3</sup> See, e.g., Sprint, p. 2 (LECs must implement 4-digit CICs by January 1, 1998, with permissive dialing extended until June 30, 1998); TRA, p. 7 (LECs must implement 4-digit CICs by January 1, 2000, with permissive dialing for at least one year thereafter); Worldcom, p. 3 (LECs must implement 7-digit CACs by January 1, 1998, with permissive dialing until January 1, 2000).

it both ways. If their customers find it inconvenient and cumbersome to dial a 7-digit CAC, it is likely that the potential customers of other carriers which have only a 7-digit CAC (*i.e.*, whose CAC is not grandfathered under Vartec's proposal) will find it equally inconvenient and cumbersome. Because this dialing disparity will disadvantage new entrants with only a 4-digit CIC and hinder competition among dial-around service providers,<sup>4</sup> any proposal which permanently institutionalizes such disparity must be rejected as being contrary to the public interest.

Respectfully submitted,

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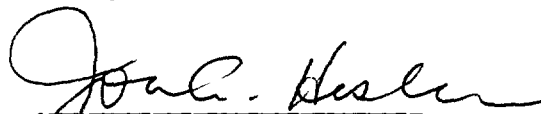
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<sup>4</sup> See Sprint, p. 3; AT&T, pp. 4-5; US West, p. 7.

## CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Reply Comments of Sprint Communications Co, LP was Hand Delivered or sent by United States first-class mail, postage prepaid, on this the 30th day of June, 1997 to the below-listed parties:

  
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